

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

NANCY HAMILTON

\*

Plaintiff

\*

vs.

\*

Civil Action No.:1:19-cv-01981-CCB

DANIEL HERSL, et al.

\*

Defendants

\*

\* \* \* \* \*

**JOINT REQUEST TO STAY EXPERT DISCLOSURES AS TO PLAINTIFF AND  
DEFENDANT BPD**

This Court having stayed discovery between BPD and Plaintiff as a result of the consent Motion to bifurcate, Plaintiff and Defendant BPD hereby also request that the Court stay expert disclosures between BPD and Plaintiff until the resolution of BPD's Motion to Dismiss and resolution of the underlying claims against the Defendant officers.

WHEREFORE, Plaintiff respectfully requests that the Court sign an order reflecting the same.

Respectfully Submitted,

/S/

James L. Rhodes, Esquire Bar #25795  
Tamiya Baskerville, Esquire #28794  
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Suite 2A  
Baltimore, MD 21206  
(410) 254-2404

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Stipulation of Partial Dismissal was filed on this 15<sup>th</sup> day of January 2020, with the United States District Court of Maryland and served electronically through the Court's electronic filing system.

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/S/

James L. Rhodes, Esquire Bar #25795